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By electronic filing

January 10, 2024

Nancy Marconi
Acting Registrar
Ontario Energy Board
2300 Yonge Street, 27th floor
Toronto, ON M4P 1E4

Dear Ms. Marconi

**Re: East-West Tie Limited Partnership by its General Partner Upper Canada
Transmission 2, Inc. (“UCT”)
Application for 2024 Rates
Board File #: EB-2023-0298**

Please find below Canadian Manufacturers and Exporter’s interrogatories in the above-noted proceeding, pursuant to Procedural Order #1 dated November 28, 2023.

Yours very truly

A handwritten signature in blue ink, appearing to read 'Scott Pollock', is written over a horizontal line.

Scott Pollock
SP/bj

c. Vincent Caron (CME)

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c.15, (Schedule B), as amended (the “*OEB Act*”);

AND IN THE MATTER OF an application by East-West Tie Limited Partnership, by its General Partner Upper Canada Transmission 2, Inc. (“UCT 2” or “Applicant”), for an Order or Orders made pursuant to section 78 of the Act approving rates for the transmission of electricity to be effective January 1, 2024.

CANADIAN MANUFACTURERS & EXPORTERS’ INTERROGATORIES

CME Interrogatory # 1

Ref: Exhibit C, Tab 2, Socotec Report, pages 11-12 of 61

At pages 10 and 11, Socotec stated that the mobilization date was rescheduled from November 1, 2018, to August 1, 2019 (a period of 9 months). This delay was attributed, at least in part to “OEB LTC approval” delays. In this regard:

- (a) Please describe all the causes of the 9-month delay to the extent there are other causes apart from the “OEB LTC approval” delays.
- (b) With respect to the OEB LTC approval delay, please explain the cause of the delay and any reason(s) why those delays were not previously anticipated by UCT.
- (c) Can Socotec please calculate the impact of removing the PIF from 9 months of the project. In other words, if the project had gone ahead with the mobilization as scheduled on November 1, 2018, and therefore 9 additional months of the project were completed prior to COVID, what would be the impact of applying the PIF to the remainder of the project?

CME Interrogatory # 2

Ref: Exhibit C, Tab 2, Socotec Report, page 23 of 61

At page 23, Socotec provided a list of publications that attempted to measure the productivity impacts of the COVID-19 pandemic. Socotec listed one study “Evaluation of measures to prevent the spread of COVID-19 on the construction sites” which estimates the impact of COVID-19 as being 20-70%. With respect to this report:

- (d) Please confirm that this report used self-reported answers from survey participants from Malaysia.
- (e) Did Socotec or UCT complete any analysis on any differences between Malaysia's response to the pandemic as opposed to Canada's or Ontario's?

CME Interrogatory #3

Ref: Exhibit D, Tab 1, pages 18-22 of 37

At page 23, UCT describes the Pic Mobert First Nation's cultural and historical resources in the White Lake Narrows Work Fronts and the associated incremental costs. With respect to this category of costs:

- (f) Is UCT aware of why the Pic Mobert First Nation didn't previously raise this issue as part of UCT's indigenous engagement? Please explain why and indicate the steps UCT took to engage with Pic Mobert prior to learning about the cultural and historical resources.
- (g) UCT describes that the new locations for the towers located E002 and E004 required archaeological investigations to ensure that the new tower locations did not disturb anything of significance to the Pic Mobert First Nation. Please provide all calculations or considerations UCT undertook to conclude that this change (and attendant required archaeological investigation) would be superior to conducting archaeological investigations on the island of White Lake to address the concern without changing the routing.

CME Interrogatory #4

Ref: Exhibit D, Tab 1, page 23 of 37

At page 23, UCT describes the application for judicial review and Notice of Appeal filed by Biinjitiwabik Zaaging Anishnabek First Nation ("BZA"). UCT states that the impact of these filings included an increase of approximately \$10 million in incremental costs. With respect to the legal proceedings and claimed incremental costs:

- (h) Please file the pleadings from the application for judicial review and Notice of Appeal, including any responses by UCT in this proceeding.
- (i) Please describe the nature of the consultation that BZA required, and any reasons why UCT did not complete these consultations earlier and/or why BZA's response was unforeseen.

